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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware Limited
Liability Company,

Plaintiff,

V.

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
Limited Liability Company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual and
citizen of Canada; THOMAS PARENTEAU, an

| Case No.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER [ECF #404]**

[First Request]

1 individual and citizen of the State of
 2 Washington; HAPPY HOUR MEDIA GROUP,
 3 LLC, a Washington Limited Liability Company;
 4 MITCHELL R. SUSSMAN, ESQ. d/b/a THE
 5 LAW OFFICES OF MITCHELL REED
 6 SUSSMAN & ASSOCIATES, an individual and
 citizen of the State of California; SCHROETER,
 7 GOLDMARK & BENDER, P.S., a Washington
 Professional Services Corporation; and KEN B.
 PRIVETT, ESQ., a citizen of the State of
 Oklahoma,

8 Defendants.

9 Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) ("FRCP"), Plaintiff Diamond
 10 Resorts U.S. Collection Development, LLC ("Diamond"), , Defendant Schroeter Goldmark &
 11 Bender, P.S. ("SGB"), and Defendant Reed Hein & Associates *dba* Timeshare Exit Team
 12 ("TET") hereby stipulate to extend the deadlines for Diamond to file its Reply in support of its
 13 Motion for Protective Order (the "Motion") [ECF #404], currently set for April 7, 2021 (SGB),
 14 and April 8, 2021 (TET), for a period of nine (9) and eight (8) days, respectively, through April
 15 16, 2021, and as grounds state as follows:

16 1. Diamond filed the Motion on March 4, 2021.
 17 2. The Parties stipulated to extend SGB's and TET's deadlines to respond to the
 Motion through April 8, 2021.

18 3. SGB filed its response to the Motion on April 1, 2021.
 19 4. TET filed its response to the Motion on April 2, 2021.
 20 5. As the Court is aware, Diamond is currently in the process of taking Depositions
 21 on Written Questions of the Identified Owners, which is taking a substantial amount of time for
 22 all parties.

23 6. In addition, the Parties, particularly Diamond and TET, are currently working to
 24 revolve various time-sensitive issues related to the DWQs of the Identified Owners.

25 7. In order to adequately reply to SGB and TET's responses, and to harmonize the
 26 reply deadlines relative to both SGB and TET's responses, the Parties have agreed to extend
 27 Diamond's deadline to file its Reply in support of the Motion SGB's Motion, and the issues

1 presented therein, the Diamond and SGB agree that Diamond's deadline to file its response
2 should be extend through April 16, 2021.

3 8. This is the Parties' first request for extension of this deadline, and it is not
4 intended to cause any delay or prejudice to any party. Defendant does not object to the requested
5 extension.

6 Dated this 5th day of April, 2021.

7 GREENSPOON MARDER LLP

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16 Development, LLC

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28 Attorneys for TET

25 IT IS SO ORDERED

26 
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 4-9-2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 5th day of April, 2021. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

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